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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,  
  
Plaintiffs,  
  
v.  
  
META PLATFORMS, INC.,  
  
Defendant.

Case No. 20-cv-08570-JD

Hon. James Donato

**DECLARATION OF BRIAN J. DUNNE  
IN SUPPORT OF ADVERTISER  
PLAINTIFFS' MOTION TO EXCLUDE  
THE EXPERT REPORT AND  
TESTIMONY OF DR. CATHERINE  
TUCKER**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States  
3 District Court for the Northern District of California. I am a partner at Bathae Dunne LLP, counsel for  
4 the Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set forth  
5 herein and, if called as a witness, could and would testify competently to them.

6 2. This declaration is made in support of Advertiser Plaintiffs' Motion to Exclude the  
7 Expert Report and Testimony of Dr. Catherine Tucker.

8 3. Attached as **Exhibit 1** is a true and correct copy of the Expert Report of Michael A.  
9 Williams, Ph.D., dated July 7, 2023.

10 4. Attached as **Exhibit 2** is a true and correct copy of the Expert Report of Joshua S. Gans,  
11 dated July 7, 2023.

12 5. Attached as **Exhibit 3** is a true and correct copy of the Advertiser Class Rebuttal Report  
13 of Catherine Tucker, Ph.D., dated August 4, 2023.

14 6. Attached as **Exhibit 4** is a true and correct copy of the Reply Report of Joshua S. Gans,  
15 dated September 1, 2023.

16 7. Attached as **Exhibit 5** is a true and correct copy of the Expert Reply Report of Michael  
17 A. Williams, Ph.D., dated September 15, 2023.

18 8. Attached as **Exhibit 6** is a true and correct copy of excerpts from deposition of Catherine  
19 Tucker, Ph.D., dated September 26, 2023.

20 9. Attached as **Exhibit 7** is a true and correct copy of excerpts from the deposition of Alex  
21 Schultz, dated March 31, 2023.

22 I declare under penalty of perjury that the foregoing is true and correct. Executed on October 6,  
23 2023, in Austin, Texas.

24 /s/ Brian J. Dunne  
25 Brian J. Dunne

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